

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)
Plaintiff,) C.A. No. 16-122-LPS
)
v.) JURY TRIAL DEMANDED
)
GROUPON, INC.) PUBLIC VERSION
)
Defendant.)

**LETTER TO THE HONORABLE LEONARD P. STARK
FROM BINDU A. PALAPURA**

OF COUNSEL:

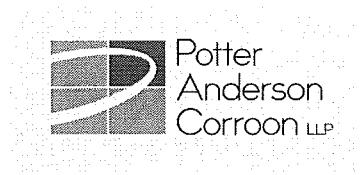
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Dated: September 8, 2017
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September 8, 2017

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VIA ELECTRONIC-FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3556

PUBLIC VERSION

Re: *International Business Machines Corporation v. Groupon, Inc.*,
C.A. No. 16-122-LPS

Dear Chief Judge Stark:

IBM has identified an inaccuracy in Groupon's September 7, 2017 letter brief and declaration concerning Ocean Tomo's role in [REDACTED]. Counsel for IBM identified the inaccuracy to counsel for Groupon and asked them to correct it, but, given that the telephonic conference for the dispute is Monday morning, and out of an abundance of caution, IBM respectfully submits the attached supplemental declaration to correct [REDACTED].

Respectfully yours,

/s/ Bindu A. Palapura

Bindu Palapura

BAP/msb/4384471/43155

Enclosures

cc: Clerk of the Court (via hand delivery)
Counsel of Record (via electronic mail)